

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
DEBORAH L. SAWYER :  
Debtor : CASE NO. 4-24-02258-MJC  
DEUTSCHE BANK NATIONAL TRUST : Motion for Relief From Stay  
COMPANY, AS TRUSTEE FOR :  
AMERIQUEST MORTGAGE :  
SECURITIES INC., ASSET-BACKED :  
PASS-THROUGH CERTIFICTAES, :  
SERIES 2006-R1 :  
Movant :  
v. :  
DEBORAH L. SAWYER :  
JEFFREY SAWYER :  
(Non-filing Co-Debtor) :  
JACK N. ZAHAROPOULOS, CH. 13 :  
TRUSTEE, :  
Respondents :  
:

**ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY  
FILED BY DEUTSCHE BANK NATIONAL TRUST COMPANY**

Comes Now, Debtor, Deborah L. Sawyer, by and through counsel, Lisa A. Rynard, Esquire, and Answers the Motion for Relief from the Automatic Stay filed by Deutsche Bank National Trust Company, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. It is denied that Debtor's failure to tender payment results in a lack of adequate protection. Movant is without cause and strict proof is demanded at hearing.
5. Admitted.
6. Admitted.

7. Admitted. By way of further Answer, Debtor has the ability to bring the account current and requests an opportunity to do so.
8. Admitted.
9. Admitted.
10. Neither admitted, nor denied. Debtor is without sufficient knowledge to form a belief as to the truth of paragraph 10.
11. Denied. Movant is without cause and strict proof otherwise is demanded at hearing.
12. Denied. Movant is without cause and strict proof otherwise is demanded at hearing.
13. Denied. Movant is without cause and strict proof otherwise is demanded at hearing.
14. Denied. Movant is without cause and strict proof otherwise is demanded at hearing.
15. Denied. Movant is without cause and strict proof otherwise is demanded at hearing.
16. Denied. Movant is without cause and strict proof otherwise is demanded at hearing.

WHEREFORE, Debtor prays that this Court will enter an Order as follows:

- a. Deny the Motion requesting modification of the automatic stay;
- b. Deny all attorney fees and costs to Movant;

c. Deny immediate enforcement of an Order granting relief from the Automatic Stay; and

d. Grant such other relief as is deemed appropriate.

Respectfully submitted,

Law Office of Lisa A. Rynard

By: /s/ Lisa A. Rynard

Lisa A. Rynard, Esquire  
240 Broad Street  
Montoursville, PA 17754  
(570) 505-3289  
[larynard@larynardlaw.com](mailto:larynard@larynardlaw.com)

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